

Jeremy David Oluma  
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 Plaintiff Pro se

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 U.S. DISTRICT COURT

**THE UNITED STATES DISTRICT COURT**  
**DISTRICT OF UTAH**  
**NORTHERN DIVISION**

Jeremy David Oluma

v.

COMPLAINT FOR DECLARATORY  
 JUDGMENT, DAMAGES, AND  
 INJUNCTIVE RELIEF

Maite Lladira Oluma  
 State of Texas  
 387th District Court, Fort Bend County  
 Assoc. Judge Richard Bell (Official Capacity)  
 Fort Bend County Prosecutor's Office  
 Fort Bend County Sheriff's Department  
 Fulshear Police Department  
 Utah County Prosecutor's Office  
 Utah Child Protective Services (CPS)  
 Orem Police Department  
 and John Does 1-10

Defendants,

In the Interest of T.O.O.

A Minor Child.

Case: 2:25-cv-00114  
 Assigned To : Oberg, Daphne A.  
 Assign. Date : 2/18/2025  
 Description: Oluma v. Oluma-Cervantes  
 et al

Case No. \_\_\_\_\_  
 Assigned Judge \_\_\_\_\_  
 Referred Magistrate Judge \_\_\_\_\_

**CERTIFICATE OF INTERESTED PARTIES**

Pursuant to DUCivR 83-1.3, the undersigned certifies that the following listed persons have a financial interest in the outcome of this case:

1. Jeremy David Oluma - Plaintiff
2. Maite Lladira Oluma-Cervantes - Defendant
3. State of Texas
4. 387th District Court, Fort Bend County
5. Associate Judge Richard Bell (Official Capacity)
6. Fort Bend County Prosecutor's Office
7. Fort Bend County Sheriff's Department
8. Fulshear Police Department
9. Utah County Prosecutor's Office
10. Utah Child Protective Services (CPS)
11. Orem Police Department

No corporation is involved as a party to this litigation.

No publicly traded company has a financial interest in the outcome.

Dated: February 17, 2025

## **I. THE PARTIES TO THIS COMPLAINT**

### **A. Plaintiff**

Name: Jeremy D. Oluma

Street Address: 23590 Great Ridge Trail

City and County: Park Rapids, Hubbard County

State and Zip Code: Minnesota, 56470

Telephone Number: 612-412-7090

E-mail Address: [jeremyoluma@gmail.com](mailto:jeremyoluma@gmail.com)

### **B. Defendant**

Name: Maite Lladira Oluma-Cervantes

Street Address: 1561 N 1150 W

City and County: Orem, Utah County

State and Zip Code: Utah, 84057

Telephone Number: 801-473-3126

E-mail Address: [mvelezo4@gmail.com](mailto:mvelezo4@gmail.com)

## **II. BASIS FOR JURISDICTION**

### **A. Federal Question Jurisdiction**

This Court has jurisdiction under 28 U.S.C. § 1331, as this action presents federal questions under:

1. The Parental Kidnapping Prevention Act (PKPA), 28 U.S.C. § 1738A
2. The Fourteenth Amendment to the United States Constitution
3. The Civil Rights Act, 42 U.S.C. § 1983
4. The Declaratory Judgment Act, 28 U.S.C. §§ 2201-2202

### **B. Nature of Federal Claims**

1. The Texas orders violate federal law
2. The orders were issued without jurisdiction and constitutional protections
3. State actors enforced void orders violating constitutional rights
4. Criminal charges stem from these void orders

### **C. Venue**

Venue lies in the Northern Division of the District of Utah under 28 U.S.C. § 1391(b)(2) because:

1. Defendant retained the minor child in Orem, Utah

2. Utah law enforcement enforced void Texas orders in this district
3. Utah County initiated criminal proceedings here
4. Constitutional violations occurred in this district

Additionally, venue is proper under § 1391(b)(1) as multiple defendants reside in this district.

#### D. Domestic Relations Exception

This action is within federal jurisdiction because it does not seek a child custody determination or modification. Rather this action challenges the enforcement of void orders and constitutional violations, custody determinations.

### **III. STATEMENT OF FACTS**

On August 16, 2022, the Utah 4th District Court ruled that Texas retained exclusive jurisdiction under the UCCJEA and confirmed Plaintiff's primary custody. On August 29, 2022, the Texas 387th District Court issued contrary custody orders without a fitness hearing. These orders contradicted the Utah UCCJEA determination.

From 2022 to 2024, Defendants enforced these Texas orders. On June 22, 2023, Plaintiff reported child abuse to Texas DFPS. A forensic interview occurred on July 13,

2023. Despite the active investigation, Defendants removed the child from Plaintiff's custody.

On March 4, 2024, law enforcement forcibly removed the child from Plaintiff's home without a warrant. Both Texas and Utah prosecutors have pursued criminal charges against Plaintiff based on the Texas void orders.

#### **IV. LEGAL FEDERAL CLAIMS**

Plaintiff brings this action to address:

1. Violations of federal law under the PKPA
2. Constitutional violations under color of state law
3. Enforcement of void orders contrary to federal law

#### **V. PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests the following relief:

1. A declaration that the August 29, 2022 Texas orders and subsequent custody orders are void ab initio
2. Injunctive relief against enforcement of void orders
3. Dismissal of criminal charges
4. Restoration of Plaintiff's custody under the August 16, 2022 UCCJEA order
5. Damages for constitutional violations

6. Costs and fees as allowed by law

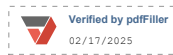
## VI. CERTIFICATION

I certify that this complaint is grounded in unambiguous facts and established law and is not filed for an improper purpose.

Dated: February 17, 2025

Respectfully Submitted,

*Jeremy David Oluma*



/s/ Jeremy David Oluma

Jeremy David Oluma

Plaintiff Pro Se

23590 Great Ridge Trail

Park Rapids, MN 56470

jeremyoluma@gmail.com

612-412-7090

**years VII. CERTIFICATE OF SERVICE**

**VII. CERTIFICATE OF SERVICE**

I hereby certify that on February 17, 2025, I filed this Complaint with the Court and will serve all defendants in accordance with Federal Rule of Civil Procedure 4.

BY: *Jeremy David Oluma*

Jeremy David Oluma

Plaintiff Pro se